

TEITELBAUM LAW GROUP, LLC
Attorneys at Law

*Jay Teitelbaum**

February 18, 2020

VIA ELECTRONIC FILING (CM/ECF)

Honorable Steward D. Aaron
United States Magistrate Judge
Daniel Patrick Moynihan Courthouse
500 Pearl Street, Room 1970
New York, NY 10007

Re: *HAHA Global, Inc., et al. v. Barclays, et al.*
Civil Action No. 1:19-cv-04749 (VEC) (SDA)

OPPOSITION TO PLAINTIFF'S MOTION TO COMPEL DISCOVERY

Dear Judge Aaron:

This letter constitutes Santander Bank N.A.’s (“Santander”) Opposition to Plaintiff Ali Aghaei’s (“Mr. Aghaei”) Motion to Compel Discovery. See ECF No. 85. Santander submits that neither discovery nor a conference to discuss the same are warranted in light of the pending Motions to Dismiss filed by Santander, Barclays, and Bank of America, N.A.¹ See ECF Nos. 52; 74; 86.

Moreover, as noted by Bank of America, N.A. in its recently-filed Opposition, this Court denied Mr. Aghaei’s prior “Motion for Expedited Discovery” in an Order dated February 3, 2020, and in so doing found that there was “no basis for expedited discovery (or any discovery at the present time)” (emphasis added). See ECF No. 83. The present Motion to Compel Discovery filed on

¹ Santander does not concede that any of Mr. Aghaei’s discovery requests comply with the Federal Rules of Civil Procedure or other applicable law in any way, and reserves all rights, arguments, and objections with respect to responding or objecting to any portion of Mr. Aghaei’s discovery requests.

1 Barker Avenue
Third Floor
White Plains, New York 10601
Telephone: 914-437-7670
Fax: 914-437-7672
All service of papers to White
Plains. Fax and E-Mail Service
Accepted

E-Mail: jteitelbaum@tblawllp.com
Website: www.tblawllp.com

9 East 40th Street
Fourth Floor
New York, New York 10016
Telephone: 646-233-3013

*Admitted: N.Y. State and Federal
Courts; United States District Courts for
the District of Connecticut and the
Southern District of Indiana

February 10, 2020 appears to rehash requests and arguments that this Court previously rejected one week earlier in its February 3, 2020 Order.

Accordingly, Santander respectfully requests that this Court deny Mr. Aghaei's Motion to Compel Discovery or, in the alternative, stay Mr. Aghaei's Motion pending adjudication of the Santander's Motions to Dismiss.

Respectfully Submitted,
TEITELBAUM LAW GROUP, LLC

By: /s/ Jay Teitelbaum

And

BOWITCH & DEWEY, LLP

By: /s/ Patrick S. Tracey

Attorneys for Santander Bank, N.A.

cc: Ali Aghaei (by ECF, Electronic Mail and U.S. First Class Mail)
HAHA Global, Inc. (by ECF, Electronic Mail and U.S. First Class Mail)
All Counsel of Record (by ECF)